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6 Attorney for Andrew Hanzelic

7
8 **UNITED STATES DISTRICT COURT**
9 **DISTRICT OF NEVADA**

10 UNITED STATES OF AMERICA,
11
12 Plaintiff,
13 v.
14 ANDREW HANZELIC,
15 Defendant.

Case No. 2:15-cr-00127-RFB

STIPULATION TO CONTINUE
SENTENCING
(Fifth Request)

16
17 IT IS HEREBY STIPULATED AND AGREED, by and between Nicholas A.
18 Trutanich, United States Attorney, and Sarah Kiewlicz, Trial Attorney, Department of Justice,
19 counsel for the United States of America, and Rene L. Valladares, Federal Public Defender,
20 and Brian Pugh, Assistant Federal Public Defender, counsel for Andrew Hanzelic, that the
21 Sentencing Hearing currently scheduled on May 7, 2020 at 2:00 pm, be vacated and continued
22 to a date and time convenient to the Court, but no sooner than ninety (90) days.

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24 This Stipulation is entered into for the following reasons:

25 1. In light of the COVID-19 pandemic, Temporary General Order 2020-05 has
26 temporarily barred in-person change of plea and sentencing hearings in criminal cases. Change

1 of plea and sentencing hearings can be conducted with the defendant's consent to appear via
2 video. Mr. Hanzelic does not waive his personal appearance at his sentencing hearing.

3 2. Mr. Hanzelic and counsel are attempting to adhere to recommended social
4 distancing practices, including teleworking and minimizing personal interactions to those that
5 are absolutely necessary. The COVID-19 pandemic and associated social distancing
6 recommendations make it difficult for Mr. Hanzelic and counsel to prepare for
7 sentencing. Based upon age (60), counsel falls into an at-risk category. For these reasons,
8 hearing preparation is difficult.

9 3. Counsel for the government is based in Washington, DC and has been barred
10 from travel unless absolutely necessary. Thus, counsel for the government cannot personally
11 attend sentencing.

12 4. The parties agree to the continuance.

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14 This is the fifth request for continuance filed herein.

15 DATED this 6th day of April 2020.

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17 RENE L. VALLADARES
18 Federal Public Defender

NICHOLAS A. TRUTANICH
United States Attorney

19 */s/ Brian Pugh*
20 By _____
21 BRIAN PUGH
Assistant Federal Public Defender

/s/ Sarah Kiewlicz
22 By _____
23 SARAH KIEWLICZ
24 Department of Justice Tax Division
25
26

1 UNITED STATES DISTRICT COURT

2 DISTRICT OF NEVADA

3 UNITED STATES OF AMERICA,

4 Plaintiff,

5 v.

6 ANDREW HANZELIC,

7 Defendant.

Case No. 2:15-cr-00127-RFB

ORDER

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10 Based on the Stipulation of counsel and good cause appearing,

11 IT IS THEREFORE ORDERED that the Sentencing Hearing currently scheduled on
12 May 7, 2020 at the hour of 2:00 p.m., be vacated and continued to August 20, 2020 at the
13 hour of 11:00 a.m.

14 DATED this 28th day of April, 2020.

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17 RICHARD F. BOULWARE, II
18 UNITED STATES DISTRICT JUDGE
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